

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

DEFENDANT PAUL J. MANAFORT, JR.'S UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE NOTICE OF OBJECTIONS

Paul J. Manafort, Jr., by and through counsel, respectfully requests an enlargement of time in which to file notice of objections to the government's motion to unseal transcripts, which is currently due by March 9, 2018. Mr. Manafort asks the Court to extend the time to file until five days after he has obtained the transcripts at issue, or other such time as the Court deems appropriate. The Special Counsel does not oppose this motion.

Undersigned counsel for Mr. Manafort does not have and has not reviewed the transcripts at issue, dated January 16, 2018, and February 14, 2018, that the government has moved to unseal. Accordingly, the reason for the requested brief extension is to provide time for Defendant to obtain the transcripts from these dates in order to make an informed determination, based on a review of the transcripts, regarding whether to file notice of objections to unsealing. There is good cause shown to grant Mr. Manafort's requested enlargement of time to permit his review of certain transcripts. A proposed order is enclosed. Mr. Manafort will file separately a motion requesting the transcripts identified in the government's motion.

For the foregoing reasons, Mr. Manafort, through undersigned counsel, respectfully requests that he be granted an enlargement of time until five days after Defendant is in receipt of the transcripts, or other such time as the Court deems appropriate, in order to provide time for him to review and file any objections he may have to the government's motion to unseal certain transcripts.

Dated: March 9, 2018

Respectfully submitted,

/s/

---

Kevin M. Downing  
Law Office of Kevin M. Downing  
601 New Jersey Avenue, NW  
Suite 620  
Washington, DC 20001  
Tel: 202-754-1992  
Fax: None  
Email: [kevindowning@kdowninglaw.com](mailto:kevindowning@kdowninglaw.com)  
DC Bar # 1013984

/s/

---

Thomas E. Zehnle  
Law Office of Thomas E. Zehnle  
601 New Jersey Avenue, NW  
Suite 620  
Washington, DC 20001  
Tel: 202-368-4668  
Fax: None  
Email: [tezehnle@gmail.com](mailto:tezehnle@gmail.com)  
DC Bar # 415556

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

## ORDER

Upon consideration of Defendant Paul J. Manafort, Jr.'s Unopposed Motion for  
Enlargement of Time to File Notice of Objections, and finding good cause shown, it is this 1  
day of March, 2018, hereby

ORDERED, that the motion is GRANTED; and it is

FURTHER ORDERED that Defendant shall file notice of any objections to the government's motion to unseal certain transcripts no later than \_\_\_ days after it is in receipt of such transcripts.

SO ORDERED.

---

AMY BERMAN JACKSON  
UNITED STATES DISTRICT JUDGE